



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 12 2008

MEMORANDUM

SUBJECT: Region 4 Non-concurrence on the Prevention of Significant Deterioration New Source Review: Refinements of Increment Modeling Procedures Rulemaking

FROM: J. I. Palmer, Jr.
Regional Administrator

A handwritten signature in black ink, appearing to read "J. I. Palmer, Jr.", written over the printed name and title.

TO: Cheryl Newton, Acting Director
Air and Radiation Division, Region 5

The purpose of this memorandum is to transmit Region 4's position on the proposed final rule Prevention of Significant Deterioration New Source Review: Refinements of Increment Modeling Procedures. Region 4 non-concurs with this proposed final rulemaking.

While the proposed final rule addresses a number of Region 4 concerns raised on previous versions of the rule, there remain a number of revisions to the increment calculating procedures that would reduce consistency, accuracy and public review as provided in EPA's current guidance and regulations and could allow greater deterioration of air quality in clean areas rather than preventing significant deterioration. The proposed final rule does not provide complete, technically sound, and clear regulations needed to ensure consistent PSD increment assessments nationwide. Our specific comments on the proposed rule are provided in the attachment to this memorandum.

Attachment